

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

No. 3:14CV1790

DECEMBER 2, 2014

MOTION FOR EXTENSION OF TIME TO FILE
AN ANSWER OR MOTION DIRECTED TO THE COMPLAINT

Defendants Beta Pharma, Inc. and Don Zhang hereby move pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 7(b) of the Local Rules of Civil Procedure of this Court for an extension of time to and including January 7, 2015 to file an answer or motion directed to the Complaint, representing a thirty-day extension of the current deadline. Because the action was removed to this Court on December 1, 2014, the current deadline for the filing of such answer or motion is December 8, 2014. Fed. R. Civ. P. 81(c)(2)(C). There is good cause for such extension, because Plaintiff's Complaint contains detailed factual allegations involving highly complex stock transactions, such that Defendants require additional time to research and frame an appropriate response.

The undersigned counsel has contacted counsel for Plaintiff, who does not object to the requested extension of time. This is Defendants' first motion for extension of time with respect to this deadline.

114

DEFENDANTS BETA PHARMA, INC. AND DON
ZHANG,

By: /s/
Michael G. Caldwell, ct26561
LeClairRyan, A Professional Corporation
545 Long Wharf Drive, Ninth Floor
New Haven, Connecticut 06511
Telephone: (203) 672-1636
Facsimile: (203) 672-1656
Email michael.caldwell@leclairryan.com
-- Their Attorney--

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was sent by first-class mail, postage prepaid,
to all counsel and pro se parties of record in this action on this 2nd day of December, 2014, as
follows:

Jonathan Katz, Esq.
Jacobs & Dow, LLC
350 Orange Street
New Haven, CT 06511

/s/
Michael G. Caldwell, ct26561